## UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF FLORIDA JACKSONVILLE DIVISION

In re:	G	
ASDRUBAL MARTINEZ,	Case No. 3:16-bk-02294-PMG Chapter 11	
Debtor.		
/		

## MOTION TO EXTEND AUTOMATIC STAY

Asdrubal Martinez, the debtor in the above-captioned bankruptcy case (the "Debtor"), respectfully requests that this Court extend the automatic stay pursuant to 11 U.S.C. 362(c)(3), and in support thereof states as follows:

- 1. On June 19, 2016, the Debtor filed a petition for relief under Chapter 11 of the Bankruptcy Code.
- 2. The Debtor's previously filed Chapter 13 bankruptcy, Case No. 3:15-bk-03035-PMG was dismissed on December 14, 2015 for failure to make plan payments.
  - 3. The Debtor had no other pending bankruptcy cases in the preceding one-year period.
- 4. The Debtor believes that this case will result in a confirmed plan that will be fully performed.

WHEREFORE, the Debtor requests that this Court enter an Order granting the Motion to Extend the Automatic Stay as to all creditors, after notice and opportunity to be heard, and for all other relief as is deemed appropriate.

/s/ Thomas C. Adam
Thomas C. Adam
Florida Bar No. 648711
ADAM LAW GROUP, P.A.
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Dated: June 23, 2016 <u>tadam@adamlawgroup.com</u>

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ASDRUBAL MARTINEZ,		Case No. 3:16-bk-02294-PMC Chapter 11
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	/	

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the *Motion to Extend Automatic Stay* was served by first-class mail, postage prepaid, or by electronic transmission upon all parties having entered an appearance in this case via the Court's CMECF system upon the parties listed on the attached mailing matrix, on this 23<sup>rd</sup> day of June, 2016.

/s/ Thomas C. Adam

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Label Matrix for local noticing Case 3:16-bk-02294-PMG Doc 9 Filed 06/23/16
113A-3 313 Valverde Lane
Case 3:16-bk-02294-PMG Saint Augustine, FL 32086-8885
Middle District of Florida
Jacksonville
Thu Jun 23 10:13:29 EDT 2016

Amex

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Filed 06/23/16

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Capital One Bank Usa N 15000 Capital One Dr Richmond, VA 23238 Discoverbank Po Box 15316 Wilmington, DE 19850 Infiniti Fin Svcs 990 W 190th St Torrance, CA 90502

Vystar Credit Union Po Box 45085 Jacksonville, FL 32232

Addresses marked (c) above for the following entity/entities were corrected as required by the USPS Locatable Address Conversion System (LACS).

Ditech Financial Llc 332 Minnesota St Ste 610 Saint Paul, MN 55101 End of Label Matrix
Mailable recipients 38
Bypassed recipients 0
Total 38